

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 23-CR-20022

Honorable Gershwin A. Drain

vs.

D-1 Mohammed Kazkaz,

D-2 Ziad Khalel, *et al.*

Defendants.

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**First Forfeiture Bill of Particulars**

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The United States, by and through its counsel, submits this First Forfeiture Bill of Particulars, pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure to supplement and clarify the forfeiture allegations contained in the Second Superseding Indictment and to provide notice of specific property the government intends to forfeit upon conviction.

The allegations set forth in the Second Superseding Indictment are re-alleged and incorporated herein by this reference for the purpose of alleging forfeiture pursuant to Federal Rule of Criminal Procedure 32.2(a) and 18 U.S.C. § 982(a)(7). As a result of violating the offenses set forth in Counts 1-4 of the Second Superseding Indictment, Defendants shall forfeit to the United States,

pursuant to 18 U.S.C. § 982(a)(7), and 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the commission of the offenses(s). As a result of violating the offenses set forth in Counts 5-10 of the Second Superseding Indictment, Defendants shall forfeit to the United States, pursuant to 18 U.S.C. 982(a)(1), any property, real or personal, involved in such offense, or traceable to such property. For all Counts, that property includes but is not limited to the following:

- \$24,987.15 in funds from Bank Account #XXXXXX6901 in the name of Ace Home Care Network, Inc. at JP Morgan Chase Bank, Detroit, Michigan;
- \$282,254.28 in funds from Bank Account #XXXXXX8271 in the name of Ace Home Care Network at JP Morgan Chase Bank, Detroit, Michigan;
- Miscellaneous Precious Items from 34600 W 12 Mile Road, Farmington Hills, Michigan;
- \$20,562.51 in funds from Bank Account #XXXXXX0690 in the name of CENTRE HRW INC at JP Morgan Chase Bank, Detroit, Michigan;
- \$10,906.87 in funds from Bank Account #XXXXXXX3732 in the name of CENTRE HRW INC at JP Morgan Chase Bank, Detroit, Michigan;
- \$10,810.00 in funds from Bank Account #XXXXXX1609 in the name of KAZ KAZ ART AND GALLERY, LLC at JP Morgan Chase Bank, Detroit, Michigan;
- \$2,309.60 in funds from Bank Account #XXXXXX2136 in the name of SAFE POINT LLC at JP Morgan Chase Bank, Detroit, Michigan;

- \$6,162.27 in funds from Bank Account #XXXXXX9616 in the name of KAZ KARING HOMES LLC at JP Morgan Chase Bank, Detroit, Michigan;
- \$489,208.84 in funds from Bank Account #XXXXXX1085 in the name of MOHAMED MOAYAD KAZKAZ at JP Morgan Chase Bank, Detroit, Michigan;
- \$1,021.16 in funds from Bank Account #XXXXXXX2878 in the name of MOHAMED MOAYAD KAZKAZ at JP Morgan Chase Bank, Detroit, Michigan;
- \$11,000.00 U.S. Currency from 34600 W 12 Mile Road, Farmington Hills, Michigan;
- \$1,500.00 Canadian Currency from 34600 W 12 Mile Road, Farmington Hills, Michigan converted to \$1,006.80 U.S. Currency
- \$2,408.80 in funds from Bank Account #XXXXXX:6809 in the name of Klajdi Ndini or Martha D. Ndini JTWROS at JP Morgan Chase Bank, Detroit, Michigan;
- \$3,089 in funds from Bank Account #XXXXXXX:6921 in the name of Kladji Ndini ITF Martha D. Ndini at JP Morgan Chase Bank, Detroit, Michigan;
- \$100,466.45 in funds from Bank Account #XXXXX:9083 in the name of Klajdi Ndini at JP Morgan Chase Bank, Detroit, Michigan;
- \$30,000.00 remitted to the United States Marshals Service by check from Move Your Feet;
- \$200,000.00 remitted to the United States Marshals Service by check from Chadwell Legal Services;
- \$80,000.00 remitted to the United States Marshals Service by Prasad Legal PLLC;

- \$67,344.93 remitted to the United States Marshals Service from Chase Account ending in 0852;
- \$54,499.93 remitted to the United States Marshals Service from Chase Account ending in 7885;
- \$102,000.00 remitted to the United States Marshals Service from Chase Account ending in 0811;
- \$13,234.43 remitted to the United States Marshals Service from Chase Account ending in 6185;
- \$18,608.89 remitted to the United States Marshals Service from Chase Account ending in 7935;
- \$285,000 remitted to the United States Marshals Service from Chase Account ending in 7893; and
- All funds on deposit in Horizon Bank Account ending in 4233, not to exceed \$392,663.25;

This First Forfeiture Bill of Particulars is also filed to comply with the provisions of 18 U.S.C. § 983(a)(3), and the government reserves its right to file a civil forfeiture complaint regarding the identified property, if necessary, during or at the conclusion of this criminal action.

This notice does not limit the government from seeking the forfeiture of additional specific property, including substitute assets, or limit the government from seeking the imposition of a forfeiture money judgment.

Respectfully submitted,

Dawn N. Ison

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Dated: June 1, 2023

**Certification of Service**

I hereby certify that on June 1, 2023, the foregoing document was electronically filed using the ECF system which will send notification of such filing to all ECF participants.

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